

## FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 1, 2000

Anne P. Petera, Treasurer Republican Party of Virginia Inc. 115 East Grace Street Richmond, VA 23219

Identification Number: C00001305

Reference: Year End Report (7/1/99-12/31/99)

Dear Ms. Petera:

This letter is to inform you that as of May 31, 2000, the Commission has not received your response to our request for additional information, dated May 10, 2000. This notice requests information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to this request (copy enclosed).

The Commission is in receipt of your 12 Day Pre-Primary Report dated May 26, 2000; however, it does not address the matters in the letter referenced above. If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions regarding this matter, please contact Kenneth A. Davis, Jr. on our toll-free number (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division) or our local number (202) 694-1130.

Sincerely,

John D. Gibson

Assistant Staff Director Reports Analysis Division

Enclosure



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Identification Number:

C00001305

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Year End Report (7/1/99-12/31/99)

Dear Ms. Petera:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-The totals listed on Lines 11(a)(i) and 11(a)(ii), Column B of the Detailed Summary Page appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B total. Please amend your report and any subsequent reports that may be affected by this correction.

-Schedule H3 of your report discloses transfers received from your non-federal account which occur outside the permissible transfer period. Please be advised that transfers for shared activity must be made within a 70-day time period: no more than 10 days before or 60 days after the payment to the vendor. 11 CFR §§106.5(g)(2) and 106.6(e)(2) Please clarify the nature of these transfers-in from the non-federal account.

The Commission recommends that you immediately transfer the total excessive amount received by your federal account outside the 70-day time period back to your non-federal account. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

-Your report discloses receipts totaling \$35,500 from George Allen Hoe Down Committee, which is a joint fundraising committee(s) affiliated with your committee. Please be advised that a <u>memo</u> Schedule A must be provided to itemize <u>your committee's share</u> of the gross contributions received through the joint fundraiser(s). The <u>memo</u> schedule should itemize each individual who has <u>contributed an aggregate in excess of \$200 during the calendar year</u>, and provide the amount of unitemized contributions received. In addition, the memo schedule should itemize your committee's share of all contributions from political committees, regardless of amount. 11 CFR §102.17(c)(8)(i)(B)

•Please amend Schedule B supporting Line 23 by providing the state and congressional district for each contribution made to a federal candidate or political committee. 11 CFR §104.3(b)(3)(ii) and (v)

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule H4 of your report to clarify the following description(s): professional fees and consulting fees. For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-Your EVENT YEAR-TO-DATE calculations for Administrative/Voter Drive are incorrect. EVENT YEAR-TO-DATE totals for administrative and voter drive costs are derived by aggregating all disbursements during the calendar year for the whole Administrative/Voter Drive category. EVENT YEAR-TO-DATE totals for fundraising, direct candidate support, and exempt activities are derived by aggregating all disbursements during the calendar year within a specific event. These should be calculated by adding the latest disbursement for a category or event to the previous EVENT YEAR-TO-DATE total for that category or event. This running EVENT YEAR-TO-DATE total should be disclosed after each disbursement is listed. Please amend your report by providing the correct EVENT YEAR-TO-DATE totals.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

incerely,

Kenneth A. Davis, Jr.

Reports Analyst

Reports Analysis Division

